



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ELM
F#2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 12, 2017

By Federal Express and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United State v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's filter team hereby furnishes discovery with respect to the above-captioned matter. This disclosure supplements the filter team's earlier disclosures under cover of letter dated May 24, 2017.

Enclosed are copies of additional emails sent or received by the email account associated with the address "zhongdan515@msn.com," beyond those previously produced, which bear Bates numbers DZFILTER0000001-DZFILTER00004977. Please note that these materials may contain privileged attorney-client communications. The prosecution team has not reviewed these materials, and the filter team's review of these materials is ongoing. This production by the government's filter team has not been deduplicated against any prior document productions.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

By: /s/ Elizabeth L. Macchiaverna
Elizabeth L. Macchiaverna
Assistant U.S. Attorney
(718) 254-6351

cc: Clerk of the Court (DLI) (by ECF)